

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	: 3:21-cr-00206
	:	
v.	:	: (Judge Mariani)
	:	
MIGUEL EDUARDO ROSARIO		: (Electronically Filed)

DEFENDANT’S TRIAL BRIEF

AND NOW comes Miguel Rosario, by his attorney Brandon R. Reish, Assistant Federal Public Defender, in compliance with this Court’s Order dated August 8, 2022 (Doc. 78), files the following trial brief.

Miguel stands accused of Conspiracy to Distribute Controlled Substances, Distribution of Controlled Substances, Possession of Firearms in Furtherance of Drug Trafficking and Conspiracy to Commit Possession of Firearms in Furtherance of Drug Trafficking. The parties have met and filed jury instructions regarding these counts, and the parties generally agree upon the instructions and have filed the same.

As always, the government bears the burden of proof in this criminal trial and the defendant carries with him the presumption of innocence and no burden to present a defense or testify. Defendant does not intend to call any expert witnesses.

Mr. Rosario awaits the government's case-in-chief before deciding if he will testify.

Date: January 13, 2023

Respectfully Submitted:

/s/Brandon R. Reish

Brandon R. Reish
Assistant Federal Public Defender
Attorney ID# PA91518

201 Lackawanna Avenue, Suite 317
Scranton, Pennsylvania 18503
(570) 343-6285 Fax: (570) 343-6225
Email: brandon_reish@fd.org
Attorney for Miguel Rosario

CERTIFICATE OF SERVICE

I, Brandon R. Reish, Assistant Federal Public Defender, do hereby certify that this document, the foregoing Trial Brief, filed electronically through the ECF system will be sent to the registered Participants as identified on the Notice of Electronic Filing, including the following:

Michelle Olshefski
Assistant United States Attorney

and by placing the same in the United States mail, first class, postage prepaid, at Scranton, Pennsylvania, addressed to the following:

Miguel Rosario

Date: January 13, 2023

s/ Brandon R. Reish
Brandon R. Reish
Assistant Federal Public Defender